

**Predicate Questions**

- 1) Could you please state and spell your last name?
- 2) Where are you currently employed?
- 3) How long have you been employed with the State Drug Laboratory?
- 4) What are the duties and responsibilities as a chemist/evidence officer at the  
Massachusetts Drug Laboratory?
- 5) What formal education have you received?
- 6) Have you also received specialized training in the field of drug analysis and  
identification?
- 7) Can you explain in general how you receive substances from police agencies?
- 8) Once the substance(s) have been logged in, are they assigned to a particular  
chemist for testing and analysis?
- 9) How do you receive case assignments for testing and analysis?
- 10) What happens when you are assigned a case?
- 11) Approximately how many times have you had occasion to test for a controlled  
substance?
- 12) Have you testified in court before regarding analyses you have conducted?
- 13) How many times and in what court?
- 14) In particular have you received training and learned how to test the presence of  
    (drug)    ?
- 15) Can you describe the test(s) to determine whether a substance contains  
    (drug)    ?

- 16) If   (drug)   is present, what happens during that test (those tests)?
- 17) Does this test have a name/ Do these tests have names?
- 18) Did you have an opportunity to analyze some substances in this case?
- 19) On   (date)  , did you receive   #   items for analysis?
- 20) Did you receive some information with those   #   items?
- 21) What information did you receive with those   #   items on   (date)  ?
- 22) Did your laboratory assign analysis numbers to those items?
- 23) What analysis numbers were assigned to the case?
- 24) Can you tell us step by step what you did with those substances?
- 25) Are the steps you just described the normal policies and procedures for testing an unknown substance?
- 26) Were you able to conclude to a reasonable degree of scientific certainty what substance was contained in item           ?
- 27) What test(s) were used to determine that?
- 28) How much did item            weigh?
- 29) Was a report generated that documented your observations and analysis?
- 30) I am placing a document before you do you recognize that document?
- 31) Did you include the information that you received with this substance on this document?
- 32) Is that your signature on the document?
- 33) Does this document relate to these drugs?
- 34) How do you know that these drugs relate to this drug certificate?

